

Appln No. 09/607,844  
Amdt. Dated December 31, 2003  
Reply to Office action of July 2, 2003

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### REMARKS/ARGUMENTS

Applicant thanks Examiner for his comments.

Claim 21 has been amended to add the comma mentioned by Examiner.

Turning to the claim rejections, Applicant respectfully disagrees with Examiner's conclusion about the relevance of Holmes to the present invention as defined in the claims.

The preferred form of the invention is described in section 8.2.2 of the accompanying detailed description. In short, there is provided a user printer module (in the preferred form, this is a printer with an internet connection) that enables a user to request first information from a first database. As defined in the claim, the module generates a first *printed media* that displays the first information to the user. Identifier means then apply an *identifier* (in the preferred form, a Netpage tag as described) *to the first printed media*. Designation of this identifier by a user (in the preferred form, using a Netpage pen as described) causes the module to retrieve *second information* from a second database and then print a *second printed media* that displays the second information.

A memory records how many times the first and second information are obtained from their respective databases.

In contrast, Holmes is an *electronic* document security system. Whilst there is some disclosure of *printed media*, there is utterly no disclosure of the production of *two printed media* whereby the second printed media is generated as a result of user interaction with an identifier on the first media.

The specific differences between the claimed invention and Holmes will be now be described, with specific reference to the italicised phrases in the preceding paragraphs.

To begin with, there is only a single piece of user information disclosed in Holmes. The system is described as a method of preventing unlicensed distribution of electronic versions of copyrighted information (see abstract and column 2, lines 7 to 11). It does this by embedding security code into an electronic object such as a document (column 3, lines 18 to 20). Users can download the document, but when they try to view it, the security code is executed and the user is prompted to enter sensitive information as well as payment information. In this way, access to the document is prevented until it is paid for (column 3, lines 23 to 38).

The system in Holmes embeds the sensitive information supplied by the user into the electronic document, such that it is visible when the document is displayed or printed. This prevents (or at least discourages) the user from forwarding the document to others to use without paying for it. It is not particularly relevant to the present invention, but Holmes also allows downstream users to pay for a license to open the document themselves, without revealing the first user's sensitive information.

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The critical thing to note here is that there is no disclosure of *printing* first media and then applying an identifier *to that media*, such that designation of that identifier causes printing of further media. Holmes arguably does disclose the addition of identifier information to a document (see Figure 2), which is present when the document is displayed on-screen or printed by a printer. However, the identifier is simply sensitive user-information that is designed to discourage that user from distributing that document to others. There is certainly no disclosure of the first user or any subsequent user being able to "designate" the identifier, such that a printer module retrieves *further* information from another database *and prints it out* onto second media.

It is noted that Examiner makes reference to Holmes disclosing "an electronic database containing printed media". With respect, this is a contradictory statement. Examiner is reminded that whilst limitations from the specification should not be unduly read into the claims, the claims must be read in light of the specification. In the present case, the entire specification is concerned with the printing of interactive documents, where it is quite clear that "printing" refers to the production of a hard copy rather than storage of a soft copy. Accordingly, the words "printed media" must be interpreted in the context of the entire specification, which makes it clear that physical printing is required. This interpretation is further supported by the claims referring to a "printer module" and to "print media". It is submitted that one skilled in the art would consider this language to refer to a printer for printing the print media, and to a physically printed article, respectively.

Should Examiner wish to maintain his assertion that "printed media" produced by a "printer module" would be interpreted by one skilled in the art as being anticipated by manipulation of electronic documents in a database, Applicant respectfully requests that evidence in support of this interpretation be provided. If Examiner wishes, Applicant will be more than happy to provide declarations from suitably qualified independent software and printer engineers in support of Applicant's contentions in relation to the language of the claims.

In view of the omission of these critical features from Holmes, it is respectfully submitted that claim 1 of the present invention is allowable.

Similar comments apply to independent claims 26, 32 and 34 due to the corresponding combinations of features they define.

It is submitted that the remaining claims are novel based on their dependence on the independent claims.

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Further consideration of the application is respectfully requested.

Very respectfully,

Applicant:



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